

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400

3050 K STREET, NW

WASHINGTON, D.C. 20007-5108

(202) 342-8400

FACSIMILE

(202) 342-8451

www.kelleydrye.com

NEW YORK, NY
TYSONS CORNER, VA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES
JAKARTA, INDONESIA
MUMBAI, INDIA

DIRECT LINE: (202) 342-8573

EMAIL: jgriffin@kelleydrye.com

August 3, 2011

Via ECFS

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: The Professionals for Lifeline and Link-Up Reform
Ex Parte Presentation – WC Docket No. 11-42, CC Docket No. 96-45, and WC
Docket No. 03-109 (with correction)**

Dear Ms. Dortch:

On June 13 and 14, 2011, FCC staff held a workshop on the development of a national database for the Lifeline and Link Up programs (“Lifeline/Link Up”), which followed on the Commission’s Notice of Proposed Rulemaking in the above referenced dockets.¹ Following this workshop, the Professionals for Lifeline and Link-Up Reform (“PLLR”)² collaborated on a proposal to facilitate the adoption and implementation of the database by addressing key issues and providing greater specification. A copy of the PLLR’s proposal is attached. The PLLR believes this proposal not only will be useful for the Commission but will serve as a basis upon which those industry participants who did not participate in the process can develop their own proposal. A copy of the PLLR’s proposal is attached.

¹ *In the Matter of Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42, CC Docket No. 96-45, and WC Docket No. 03-109, Notice of Proposed Rulemaking (rel. Mar. 4, 2011).

² The PLLR consists of CGM, LLC; CompTel; DPI Teleconnect; Emerios, a division of VMBC Corporation; Global Connections, Inc.; Image Access, Inc.; i-wireless, LLC; Midwestern Telecom, Inc.; Stand Up Wireless, LLC; TAG Mobile, LLC; Telrite, d/b/a/ Life Wireless; Terracom, Inc.; TracFone; West Corporation; and YourTel America.

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As discussed therein, through their considerable experience in developing and operating real-time or near real-time lifeline-related databases for entities engaged in Lifeline/Link Up, the PLLR believe the Commission can maximize its chances of success in implementing the database -- the Eligibility and Duplicate Management Platform ("EDMP") -- by adopting a phased approach to integrating functionalities. By moving in stages, the Commission can build upon the interim solutions currently being deployed by ETCs and third-party service bureaus and can drive the implementation of the EDMP to which all impacted parties (ETCs, states, USAC, FCC) may integrate with the minimum needed to change their processes.

In the first phase of the solution, which could be accomplished within months after a Commission formal rulemaking, a neutral third-party administrator would develop and implement, as part of the EDMP, a Duplicate Elimination and Preference Management System ("DEPM" or "Phase I") which would provide a carrier-neutral pre-qualification process to identify and verify whether a household or individual is already receiving a Lifeline/Link Up benefit and enable thereby the elimination of duplicate benefits. The PLLR proposal is primarily focused on the requirements for the Phase I solution.

The second phase ("Phase II"), which would likely take more than 6 months to implement, would be the implementation of a technological solution to enable the full qualification of a consumer as well as automated annual verifications. Phase II would build on the structure and systems developed in Phase I, thus dramatically reducing the cost and effort required to expand the functionality of the DEPM. Through the addition of a state administration interface, Phase II would allow a state to configure, manage, and audit the dynamic rules engine created in Phase I to the state's documentation requirements, thereby providing ETCs, solution providers, and state administrators an automated process for determining the eligibility of Lifeline/Link Up enrollees. In addition, states could easily integrate their state eligibility data warehouses with Phase II and thus allow the ETCs to access their data warehouses through Phase II in real-time. Duplicate elimination and preference management would continue during Phase II.

Should the Commission wish to discuss this proposal, please contact the undersigned counsel.

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This letter is being filed electronically pursuant to section 1.1206 of the Commission's rules.

Sincerely,

A handwritten signature in blue ink, appearing to read "Joan M. Griffin". The signature is fluid and cursive, with the first name "Joan" being more prominent.

Joan M. Griffin
Counsel for Emerios

cc: Kimberly Scardino
Jonathan Lechter